

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Derek W. Loeser (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBIT A TO PARTIES'
JOINT STATUS UPDATE**

Pursuant to Civil Local Rules 79-5 and 7-11, and the Stipulated Protective Order entered by the Court on August 17, 2018 (ECF No. 122), the Consolidated Plaintiffs (“Plaintiffs”) hereby submit this Administrative Motion to File Under Seal. Specifically, Plaintiffs move for leave to file under seal the following document:

- Exhibit A to Joint Status Update (“Exhibit A”).

Plaintiffs move for leave to file Exhibit A under seal because the exhibit contains specific reference to information derived from reports by PricewaterhouseCoopers that defendant Facebook, Inc. has designated “Confidential” pursuant to the Protective Order. *See* accompanying Declaration of Anne K. Davis (“Davis Decl.”), ¶ 5.

Consistent with Rule 79-5(e), Facebook, as the Designating Party, must file a declaration as required by subsection 79-5(d)(1)(A) establishing that all of the designated material is sealable, or the information at issue will be made part of the public record. Pursuant to this Court’s Standing Order, the document at issue has been provided to the Court by appropriately filing it electronically under seal in an unredacted form, and by submitting chambers copies. Civil Standing Order for Magistrate Judge Jacqueline Scott Corley, p. 3.

In light of the foregoing, Plaintiffs respectfully request that the Court grant their Administrative Motion to File Under Seal.

Dated: May 14, 2020

Respectfully submitted,

KELLER ROHRBACK L.L.P.

BLEICHMAR FONTI & AULD LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

By: /s/ Lesley E. Weaver
Lesley E. Weaver

Derek W. Loeser (admitted *pro hac vice*)
Lynn Lincoln Sarko (admitted *pro hac vice*)
Gretchen Freeman Cappio (admitted *pro hac vice*)
Cari Campen Laufenberg (admitted *pro hac vice*)
David Ko (admitted *pro hac vice*)
Adele A. Daniel (admitted *pro hac vice*)
Benjamin Gould (SBN 250630)
1201 Third Avenue, Suite 3200
Seattle, WA 98101

Lesley E. Weaver (SBN 191305)
Anne K. Davis (SBN 267909)
Joshua D. Samra (SBN 313050)
Matthew P. Montgomery (SBN 180196)
Angelica M. Ornelas (SBN 285929)
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020

Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com
lsarko@kellerrohrback.com
gcappio@kellerrohrback.com
claufenberg@kellerrohrback.com
bgould@kellerrohrback.com
dko@kellerrohrback.com
adaniel@kellerrohrback.com

lweaver@bfalaw.com
adavis@bfalaw.com
jsamra@bfalaw.com
mmontgomery@bfalaw.com
aornelas@bfalaw.com

Christopher Springer (SBN 291180)
801 Garden Street, Suite 301
Santa Barbara, CA 93101
Tel.: (805) 456-1496
Fax: (805) 456-1497
cspringer@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of May, 2020, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Sarah Skaggs, hereby certify that on May 14, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record.

/s/ Sarah Skaggs

Sarah Skaggs